

197200

STATE OF SOUTH CAROLINA

(Caption of Case)

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

COPY

Filed: led

COVER SHEET

Dept: S.A.

Date: 2/5/09

Time: 10:05

DOCKET

NUMBER: 2008 - 251 - E

Application of Carolina Power & Light
Company, d/b/a Progress Energy Carolinas,
Incorporated for the Establishment of
Procedures for DSM/EE Programs

(Please type or print)

Submitted by: Christopher K. DeScherer
Address: Southern Environmental Law Center
38 Broad Street, Suite 200
Charleston, SC 29401

SC Bar Number: 77753
Telephone: (843) 720-5270
Fax: (843) 720-5240
Other: _____

Email: cdescherer@selcsc.org

NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

DOCKETING INFORMATION (Check all that apply)

- ☐ Emergency Relief demanded in petition ☐ Request for item to be placed on Commission's Agenda expeditiously
- ☐ Other: _____

| INDUSTRY (Check one) | NATURE OF ACTION (Check all that apply) | | |
|--|--|--|--|
| <input checked="" type="checkbox"/> Electric | <input type="checkbox"/> Affidavit | <input type="checkbox"/> Letter | <input type="checkbox"/> Request |
| <input type="checkbox"/> Electric/Gas | <input type="checkbox"/> Agreement | <input type="checkbox"/> Memorandum | <input type="checkbox"/> Request for Certification |
| <input type="checkbox"/> Electric/Telecommunications | <input checked="" type="checkbox"/> Answer | <input type="checkbox"/> Motion | <input type="checkbox"/> Request for Investigation |
| <input type="checkbox"/> Electric/Water | <input type="checkbox"/> Appellate Review | <input type="checkbox"/> Objection | <input type="checkbox"/> Resale Agreement |
| <input type="checkbox"/> Electric/Water/Telecom. | <input type="checkbox"/> Application | <input type="checkbox"/> Petition | <input type="checkbox"/> Resale Amendment |
| <input type="checkbox"/> Electric/Water/Sewer | <input type="checkbox"/> Brief | <input type="checkbox"/> Petition for Reconsideration | <input type="checkbox"/> Reservation Letter |
| <input type="checkbox"/> Gas | <input type="checkbox"/> Certificate | <input type="checkbox"/> Petition for Rulemaking | <input type="checkbox"/> Response |
| <input type="checkbox"/> Railroad | <input type="checkbox"/> Comments | <input type="checkbox"/> Petition for Rule to Show Cause | <input type="checkbox"/> Response to Discovery |
| <input type="checkbox"/> Sewer | <input type="checkbox"/> Complaint | <input type="checkbox"/> Petition to Intervene | <input type="checkbox"/> Return to Petition |
| <input type="checkbox"/> Telecommunications | <input type="checkbox"/> Consent Order | <input type="checkbox"/> Petition to Intervene Out of Time | <input type="checkbox"/> Stipulation |
| <input type="checkbox"/> Transportation | <input type="checkbox"/> Discovery | <input type="checkbox"/> Prefiled Testimony | <input type="checkbox"/> Subpoena |
| <input type="checkbox"/> Water | <input type="checkbox"/> Exhibit | <input type="checkbox"/> Promotion | <input type="checkbox"/> Tariff |
| <input type="checkbox"/> Water/Sewer | <input type="checkbox"/> Expedited Consideration | <input type="checkbox"/> Proposed Order | <input type="checkbox"/> Other: |
| <input type="checkbox"/> Administrative Matter | <input type="checkbox"/> Interconnection Agreement | <input type="checkbox"/> Protest | |
| <input type="checkbox"/> Other: | <input type="checkbox"/> Interconnection Amendment | <input type="checkbox"/> Publisher's Affidavit | |
| | <input type="checkbox"/> Late-Filed Exhibit | <input type="checkbox"/> Report | |

RECEIVED

FEB 05 2009

PSC SC
DOCKETING DEPT.

SOUTHERN ENVIRONMENTAL LAW CENTER

Telephone 843-720-5270
Facsimile 843-720-5240
SouthernEnvironment.org

P.O. Box 609
Charleston, SC 29402-0609

Street Address:
38 Broad Street, Suite 200
Charleston, SC 29401-3042

Charlottesville, VA
Chapel Hill, NC
Atlanta, GA

February 4, 2009

VIA ELECTRONIC FILING

RECEIVED

FEB 05 2009

PSC SC
DOCKETING DEPT.

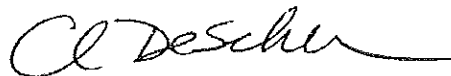
Mr. Charles Terreni
Chief Clerk/Administrator
South Carolina Public Service Commission
101 Executive Drive
Columbia, SC 29210

Re: Progress Energy Carolinas, Inc. Interrogatories and Request for
Production of Documents in South Carolina Public Service Commission
Docket No. 2008-251-E.

Dear Mr. Terreni:

Please find enclosed the responses of Southern Environmental Law Center,
Natural Resources Defense Council, the Southern Alliance for Clean Energy and the
South Carolina Coastal Conservation League to Progress Energy Carolinas, Inc.'s
Interrogatories and Request for Production of Documents in the above-mentioned docket.

Yours truly,



Christopher K. DeScherer
Senior Attorney

Enclosures

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Intervenor's Responses and Objections to PEC's Interrogatories and Request for Production of Documents was served, by electronic mail, upon:

Thomas S. Mullikin , Counsel
Nucor Steel - South Carolina
Moore & Van Allen, PLLC
100 North Tryon Street, Ste. 4700
Charlotte, NC, 28202
Email: tommullikin@mvalaw.com

Robert R. Smith, II , Counsel
Nucor Steel-South Carolina
Moore & Van Allen, PLLC
100 North Tyron St., Suite 4700
Charlotte, NC, 28202
Email: robsmith@mvalaw.com

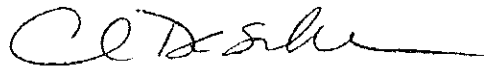
Shealy Boland Reibold , Counsel
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, SC, 29201
Email: sreibol@regstaff.sc.gov

Len S. Anthony
General Counsel
Progress Energy Carolinas, Inc.
Post Office Box 1551
Raleigh, NC, 27602
Email: Len.S.Anthony@pgnmail.com

Holly Rachel Smith , Counsel
Wal-Mart Stores East, LP
Russell W. Ray, PLLC
6212-A Old Franconia Road
Alexandria, VA, 22310
Email: holly@raysmithlaw.com

Timothy J. Monahan , Counsel
Wal-Mart Stores East, LP
Monahan & Moses, LLC
13-B W. Washington Street
Greenville, SC, 29601
Email: Tim.Monahan@momolaw.com

This 4th day of February, 2009.



Christopher K. DeScherer